

1 Lexi J. Hazam (SBN 224457)
 2 lhazam@lchb.com
 3 LIEFF CABRASER HEIMANN
 & BERNSTEIN, LLP
 4 275 Battery Street, 29th Floor
 San Francisco, CA 94111-3339
 Telephone: (415) 956-1000

5 Previn Warren (*pro hac vice*)
 6 pwarren@motleyrice.com
 MOTLEY RICE LLC
 7 401 9th Street NW, Suite 630
 Washington, DC 20004
 8 Telephone: (202) 386-9610

9 *Plaintiffs' Co-Lead Counsel*

Jennie Lee Anderson (SBN 203586)
jennie@andrusanderson.com
 ANDRUS ANDERSON LLP
 155 Montgomery Street, Suite 900
 San Francisco, CA 94104
 Telephone: (415) 986-1400

Plaintiffs' Liaison Counsel

10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**

12 IN RE: SOCIAL MEDIA ADOLESCENT
 13 ADDICTION/PERSONAL INJURY
 PRODUCTS LIABILITY LITIGATION

14 This Document Relates to:

15 *R.B. and A.B. v. Snap Inc.*, 4:24-cv-04083;
 16 *K.G. and N.F. v. Snap Inc., et al.*, 4:24-cv-
 17 04086;
 18 *K.K. and K.A. v. Meta Platforms, Inc. et al.*,
 19 4:24-cv-04425;
 20 *K.K. and C.K. v. Meta Platforms, Inc. et al.*,
 21 4:24-cv-04426;
 22 *C.S., filed on behalf of minor T.P. v. Meta*
 23 *Platforms, Inc. et al.*, 4:24-cv-04495;
 24 *M.M., filed on behalf of minor A.B. v. Meta*
 25 *Platforms, Inc. et al.*, 4:24-cv-04578;
 26 *K.N., filed on behalf of minor A.N. v. Meta*
 27 *Platforms, Inc. et al.*, 4:24-cv-05161;
 28 *S.C., filed on behalf of minor D.G. v. Meta*
Platforms, Inc. et al., 4:24-cv-05178;
C.C., filed on behalf of minor L.C. v. Meta
Platforms, Inc. et al., 4:24-cv-05369;

Case No. 4:22-MD-03047-YGR
 MDL No. 3047

**PLAINTIFFS' ELEVENTH
 CONSOLIDATED EX PARTE
 APPLICATION FOR APPOINTMENT OF
 GUARDIANS AD LITEM**

C.D., on behalf of C.F. v. Meta Platforms, Inc. et al., 4:24-cv-06506;

J.H., filed on behalf of minor M.H. v. Meta Platforms, Inc., et al., 4:24-cv-06613;

B.B., filed on behalf of minor O.B. v. Meta Platforms, Inc., 4:24-cv-06139;

L.J. and B.J. v. Meta Platforms, Inc. et al.,
4:24-cv-06722;

J.G., individually and on behalf of Z.J. v. Meta Platforms, Inc. et al., 4:24-cv-06723;

B.D., on behalf of Z.H. v. Meta Platforms, Inc. et al., 4:24-cv-06727:

D.C., on behalf of T.S. v. Meta Platforms, Inc. et al. 4:24-cv-06728:

D.C. and E.B v. Snap Inc. et al., 4:24-cv-06729:

R.Z., filed on behalf of minor C.Z. v. Metal Platforms, Inc. et al. 4:24-cv-06641

APPLICATION

Pursuant to this Court’s Order Regarding Appointment of Guardian *Ad Litem* (“Guardians *Ad Litem* Order”) (ECF No. 122 at 3), Plaintiffs’ Liaison Counsel, Jennie Lee Anderson, hereby submits Plaintiffs’ Eleventh Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“*Ex Parte* Application”) for this Court’s consideration.

“Fit parents are presumed to act in the best interests of their children.” *J.B. by & Through Billiet v. Tuolumne Cnty. Superintendent of Sch.*, No. 19-cv-0858-NONE-EPG, 2021 WL 3115195, at *2 (E.D. Cal. July 22, 2021) (citing *Troxel v. Granville*, 530 U.S. 57, 66 (2000); *Doe v. Heck*, 327 F.3d 492, 521 (7th Cir. 2003)); *see also Brown v. Alexander*, No. 13-cv-01451-RS, 2015 WL 7350183, at *1 (N.D. Cal. Nov. 20, 2015) (“In general, a parent who is also a party to the lawsuit is presumed to be a suitable guardian ad litem, and so the court often appoints the parent as guardian ad litem upon receipt of an ex parte application without exercising much discretion.”) (citation omitted). Absent a conflict of interest, “[a] parent is generally appointed

1 guardian *ad litem*.” *A.G. v. South Bay Dreams Coop., Inc.*, No. 16-cv-02598-RNB, 2018 WL
 2 2002370, at *3 (S.D. Cal. Apr. 30, 2018) (citing *Anthem Life Ins. Co. v. Olguin*, No. 06-cv-
 3 01165-AWI NEW (TAG), 2007 WL 1390672, at *3 (E.D. Cal. May 9, 2007)); *accord J.M. v.*
 4 *Liberty Union High Sch. Dist.*, No. 16-cv-05225-LB, 2016 WL 4942999, at *2 (N.D. Cal.
 5 Sept.16, 2016). However, “[w]hen there is a potential conflict between a perceived parental
 6 responsibility and an obligation to assist the court in achieving a just and speedy determination of
 7 the action, a court has the right to select guardian *ad litem* who is not a parent if that guardian
 8 would best protect the child’s interests.” *J.M.*, 2016 WL 4942999, at *1 (citations omitted)
 9 (internal quotation marks omitted).

10 Attached as Exhibits 1-18 to the Declaration of Jennie Lee Anderson in Support of
 11 Plaintiffs’ Eleventh Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem*
 12 (“Anderson Decl.” or “Anderson Declaration”) are the *Ex Parte* Applications for Appointment of
 13 Guardians *Ad Litem* (“Applications”) submitted by the parents and/or legal guardians of individual
 14 minor Plaintiffs in the following cases.

- 15 • *R.B. and A.B. v. Snap Inc.*, 4:24-cv-04083 (Exhibit 1)
- 16 • *K.G. and N.F. v. Snap Inc., et al.*, 4:24-cv-04086 (Exhibit 2);
- 17 • *K.K. and K.A. v. Meta Platforms, Inc. et al.*, 4:24-cv-04425 (Exhibit 3);
- 18 • *K.K. and C.K. v. Meta Platforms, Inc. et al.*, 4:24-cv-04426 (Exhibit 4);
- 19 • *C.S., filed on behalf of minor T.P. v. Meta Platforms, Inc. et al.*, 4:24-cv-04495
 20 (Exhibit 5);
- 21 • *M.M., filed on behalf of minor A.B. v. Meta Platforms, Inc. et al.*, 4:24-cv-04578
 22 (Exhibit 6);
- 23 • *K.N., filed on behalf of minor A.N. v. Meta Platforms, Inc. et al.*, 4:24-cv-05161
 24 (Exhibit 7);
- 25 • *S.C., filed on behalf of minor D.G. v. Meta Platforms, Inc. et al.*, 4:24-cv-05178
 26 (Exhibit 8);
- 27 • *C.C., filed on behalf of minor L.C. v. Meta Platforms, Inc. et al.*, 4:24-cv-05369
 28 (Exhibit 9);

- *C.D., on behalf of C.F. v. Meta Platforms, Inc. et al.*, 4:24-cv-06506 (Exhibit 10);
- *J.H., filed on behalf of minor M.H. v. Meta Platforms, Inc., et al.*, 4:24-cv-06613 (Exhibit 11);
- *B.B, filed on behalf of minor O.B. v. Meta Platforms, Inc.*, 4:24-cv-06139 (Exhibit 12);
- *L.J. and B.J. v. Meta Platforms, Inc. et al.*, 4:24-cv-06722 (Exhibit 13);
- *J.G., individually and on behalf of Z.J. v. Meta Platforms, Inc. et al.*, 4:24-cv-06723 (Exhibit 14);
- *B.D., on behalf of Z.H. v. Meta Platforms, Inc. et al.*, 4:24-cv-06727 (Exhibit 15);
- *D.C., on behalf of T.S. v. Meta Platforms, Inc. et al.*, 4:24-cv-06728 (Exhibit 16);
- *D.C., and E.B v. Snap Inc. et al.*, 4:24-cv-06729 (Exhibit 17);
- *R.Z., filed on behalf of minor C.Z. v. Meta Platforms, Inc. et al.*, 4:24-cv-06641 (Exhibit 18).

Exhibits 1-18 to the Anderson Declaration are Applications submitted to Plaintiffs' Liaison Counsel for filing since the last guardian *ad litem* submission. The Applications attached to the Anderson Declaration as Exhibits 1-18 are consistent with Attachment A to this Court's Guardian *Ad Litem* Order (ECF No. 122) and include (1) the applicant's name and contact information (including address, email, and telephone number); (2) the name, case number, state of domicile (and its minimum age of capacity); (3) a sworn statement that the applicant is the parent and/or legal guardian of the minor plaintiff; and (4) a sworn statement affirming that the applicant is fully competent and qualified to understand and protect the rights of the minor plaintiff and has no interests adverse to the interests of that person. Anderson Decl. ¶ 21.

Pursuant to this Court’s Guardians *Ad Litem* Order, the Applications by parents and/or legal guardians in the cases listed above are deemed presumptively approved upon filing, as there is no apparent conflict between the applicants’ parental responsibility and their obligation to assist the Court in “achieving a just and speedy determination of the action.” ECF No. 122 ¶ 4 (citing *J.M.*, 2016 WL 494299, at *1). This Court also ordered that, absent the filing of an objection, the presumptive approval shall become final fifteen days after the date this *Ex Parte* Application is filed. ECF No. 122 ¶ 5. The fifteenth day in this instance falls on a Saturday, and Monday,

1 November 11, 2024, is a Court holiday. Therefore, the objection period will close on November
 2 12, 2024.

3 Accordingly, Plaintiffs submit herewith a [Proposed] Order Granting *Ex Parte*
 4 Applications and Appointing Guardian *Ad Litem* appointing the parent and/or legal guardian
 5 named in the Applications submitted in the case listed above.

6

7 Dated: October 25, 2024

Respectfully submitted,

ANDRUS ANDERSON LLP

9 /s/ Jennie Lee Anderson
 10 JENNIE LEE ANDERSON (SBN 203586)
 11 jennie@andrusanderson.com

12 **ANDRUS ANDERSON LLP**
 13 155 Montgomery Street, Suite 900
 14 San Francisco, CA 94104
 15 Telephone: (415) 986-1400

Plaintiffs' Liaison Counsel

16 LEXI J. HAZAM (SBN 224457)
 17 lhazam@lchb.com
 18 **LIEFF CABRASER HEIMANN**
 19 & **BERNSTEIN, LLP**
 20 275 Battery Street, 29th Floor
 21 San Francisco, CA 94111-3339
 22 Telephone: (415) 956-1000
 23 Facsimile: (415) 956-100

24 PREVIN WARREN (*pro hac vice*)
 25 pwarren@motleyrice.com
 26 **MOTLEY RICE LLC**
 27 401 9th Street NW, Suite 630
 Washington, DC 20004
 Telephone: (202) 386-9610
 Facsimile: (202) 232-5513

Plaintiffs' Co-Lead Counsel

28 CHRISTOPHER A. SEEGER (*pro hac vice*)
 29 **SEEGER WEISS, LLP**
 30 55 Challenger Road, 6th Floor
 Ridgefield Park, NJ 07660
 Telephone: (973) 639-9100
 Facsimile: (973) 679-8656
cseeger@seegerweiss.com

Counsel to the Co-Lead Counsel and Settlement

1 *Counsel*

2 JOSEPH G. VANZANDT
 3 **BEASLEY ALLEN CROW METHVIN**
 4 **PORTIS & MILES, P.C.**
 5 234 COMMERCE STREET
 6 MONTGOMERY, AL 36103
 7 Telephone: 334-269-2343
 8 joseph.vanzandt@beasleyallen.com

9
 10 EMILY C. JEFFCOTT
 11 **MORGAN & MORGAN**
 12 220 W. GARDEN STREET, 9TH FLOOR
 13 PENSACOLA, FL 32502
 14 Telephone: 850-316-9100
 15 ejeffcott@forthepeople.com

16 *Federal/State Liaisons*

17 MATTHEW BERGMAN
 18 **SOCIAL MEDIA VICTIMS LAW CENTER**
 19 821 SECOND AVENUE, SUITE 2100
 20 SEATTLE, WA 98104
 21 Telephone: 206-741-4862
 22 matt@socialmediavictims.org

23 JAYNE CONROY
 24 **SIMMONS HANLY CONROY, LLC**
 25 112 MADISON AVE, 7TH FLOOR
 26 NEW YORK, NY 10016
 27 Telephone: 917-882-5522
 28 jconroy@simmonsfirm.com

ANDRE MURA
 20 **GIBBS LAW GROUP, LLP**
 21 1111 BROADWAY, SUITE 2100
 22 OAKLAND, CA 94607
 23 Telephone: 510-350-9717
 24 amm@classlawgroup.com

25 MICHAEL M. WEINKOWITZ
 26 **LEVIN SEDRAN & BERMAN, LLP**
 27 510 WALNUT STREET
 28 SUITE 500
 PHILADELPHIA, PA 19106
 Telephone: 215-592-1500
mweinkowitz@lfsbalw.com

1 ALEXANDRA WALSH
 2 **WALSH LAW**
 3 1050 Connecticut Ave, NW, Suite 500
 4 Washington D.C. 20036
 5 Telephone: 202-780-3014
 6 awalsh@alexwalshlaw.com

7 JAMES J. BILSBORROW
 8 **WEITZ & LUXENBERG, PC**
 9 700 BROADWAY
 10 NEW YORK, NY 10003
 11 Telephone: 212-558-5500
 12 jbilsborrow@weitzlux.com

13 ***Plaintiffs' Steering Committee Leadership***

14 PAIGE BOLDT
 15 **WATTS GUERRA LLP**
 16 4 Dominion Drive, Bldg. 3, Suite 100
 17 San Antonio, TX 78257
 18 Telephone: 210-448-0500
 19 PBoldt@WattsGuerra.com

20 CARRIE GOLDBERG
 21 **C.A. GOLDBERG, PLLC**
 22 16 Court St.
 23 Brooklyn, NY 11241
 24 Telephone: (646) 666-8908
 25 carrie@cagoldberglaw.com

26 SIN-TINY MARY LIU
 27 **AYLSTOCK WITKIN KREIS & OVERHOLTZ,
 28 PLLC**
 29 17 EAST MAIN STREET, SUITE 200
 30 PENSACOLA, FL 32502
 31 Telephone: 510-698-9566
 32 mliu@awkolaw.com

33 EMMIE PAULOS
 34 **LEVIN PAPANTONIO RAFFERTY**
 35 316 SOUTH BAYLEN STREET, SUITE 600
 36 PENSACOLA, FL 32502
 37 Telephone: 850-435-7107
 38 epaulos@levinlaw.com

39 ROLAND TELLIS
 40 **BARON & BUDD, P.C.**
 41 15910 Ventura Boulevard, Suite 1600

Encino, CA 91436
Telephone: (818) 839-2333
rtellis@baronbudd.com

DIANDRA "FU" DEBROSSE ZIMMERMANN
DICELLO LEVITT
505 20th St North
Suite 1500
Birmingham, Alabama 35203
Telephone: 205.855.5700
fu@dicelrolevitt.com

HILLARY NAPPI
HACH & ROSE LLP
112 Madison Avenue, 10th Floor
New York, New York 10016
Telephone: 212.213.8311
hnappi@hrsclaw.com

JAMES MARSH
MARSH LAW FIRM PLLC
31 HUDSON YARDS, 11TH FLOOR
NEW YORK, NY 10001-2170
Telephone: 212-372-3030
jamesmarsh@marshlaw.com

RUTH RIZKALLA
CARLSON LAW FIRM
100 E. Central Texas Expy
Killeen, TX 76541
Telephone: (254) 526-5688
RRizkalla@carlsonattorneys.com

RON A. AUSTIN
RON AUSTIN LAW
400 Manhattan Blvd
Harvey, LA 70058
504-227-8100
Fax: 504-227-8122
raustin@ronaustinlaw.com

Plaintiffs' Steering Committee Membership